



# PARTNERSHIP FOR SUSTAINABLE OCEANS

Recreational Fishermen Protecting California's Ocean Resources

November 19, 2007

The Honorable Susan Golding, Chair  
MLPA Initiative Blue Ribbon Task Force  
c/o California Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

RE: Public Comments at November 19, 2007 BRTF Meeting

Dear Mayor Golding and fellow BRTF Members:

Thank you for the opportunity to speak today. My name is Bob Osborn, Fishery Consultant for United Anglers of Southern California. I am here today representing the Partnership for Sustainable Oceans (PSO). Our partners in the PSO are the United Anglers of Southern California, Coastside Fishing Club, American Sportfishing Association, Sportfishing Association of California, Southern California Marine Association, National Marine Manufacturing Association, and NorCal Kayak Anglers. My professional background is as a trained and certified management consultant with extensive training in auditing; including the auditing of issues used for evaluating technical information in order to arrive at conclusions and provide recommendations as to its adequacy for decision making purposes.

Our partnership is committed to recommending a network of MPAs that enables the best conservation outcome for the ocean and its resources so that we may pass on our sport to future generations.

Let me preface my remarks with a thank you. I would like to thank this task force for being responsive to our comments, and for being responsive to our requests to make this a science-based process. This makes for a more productive and robust discussion and at the same provides for opportunities for everyone to better understand the issues at hand. There remains much to do, but your continued commitment to a completely open and transparent process will help greatly in bringing stakeholders to the table. So thank you again for your help.

**Our first concern** is the SAT uses various terms for the levels of protection: very high, high, moderate high, moderate, moderate low, and low. Dr. Mark Carr, author of the ratings and co-chairman of the SAT indicated during the most recent SAT meeting held in Pacifica on November

13, 2007, that there is no quantitative difference between the various levels. That “moderate low” is not half as good as “moderate.” This does not imply that the levels of protection are not useful for policy decisions, but one should not infer that there are vast differences between these ratings – when in fact more often than not it is untrue.

Comparing actual performances between various California fisheries can put in quick perspective how to design networks of MPAs at the least loss of jobs and cost to the public.

**Our second concern** is with the time the SAT is spending discussing and considering issues of uncertainty. This is limiting the ability of the SAT to spend their time identifying the best readily available science and to give consideration to models that most objectively quantify the expected biological and economic results of various mpa network proposals.

A careful reading of the MLPA will note the mandate to use the best readily available science. The only place in the act where any form of uncertainty is mentioned is in the definition for Adaptive Management.

This clearly places the resolution of matters of uncertainty into the adaptive management process. Some SAT members are expressing frustration over time spent on discussions related to the inadequacy of the best readily available science instead of designing a network based on the best readily available science as mandated by the act. An attempt appears underway to discard the best readily available science in favor of a hypothesis that favors excessive reserves and at the same time limiting what we will be able to learn about fishing activities in the future.

Good management always uses the best information and designs plans to continually improve that information so that adaptive changes can be made as more is learned.

During the lessons learned process from the central region, the need for professional moderation of the SAT was identified. We recommend that the BRTF take steps immediately to get the SAT back on track.

**Our third concern** is that some of the science offered by RSG and outside participants is not being objectively considered by the SAT. For instance there are documented studies showing that even remote and small marine protected areas, in which only the most destructive gears are prohibited, do in fact incrementally operate towards achieving the goals of the act. This fact is clearly established in a great deal of MPA literature from studies in the San Juan Islands in the state of Washington, to other studies on the Georges Bank off of New England. And yet this body of work has not been given full consideration by the SAT. Cherry picking the science is not an acceptable practice. We contend that if all the applicable science is applied, then an MPA which contains areas that eliminate nearly all catch of a regional species of concern, and which otherwise provides a high conservation value, would not be rated a zero only because the area does not meet the preferred size guideline. Each MPA in the network needs to be considered for the conservation value it offers in building the network. Quantitative models and the data necessary to do this are available, but the SAT has not been allowed sufficient time to vet them.

Thank you for the opportunity to present our concerns. I again reiterate that a successful conservation outcome is our objective and considering the ecological and socio-economic implications it is absolutely essential we be successful in doing this right.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Osborn". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bob Osborn, Fishery Consultant  
United Anglers of Southern California